

# EXHIBIT “A”

2022CV00836

e-Filed 4/26/2022 12:37 PM

*Tiki Brown*  
Tiki Brown  
Clerk of State Court  
Clayton County, Georgia  
Hannah Lowery

**IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA**

**KAREN PARQUETTE,**

Plaintiff,

VS.

**FAMILY DOLLAR STORES OF  
GEORGIA, LLC, and JOHN DOES**

**NOS 1-10** whether singular or plural,  
whether masculine or feminine, whether  
entities or individuals, whom are not known  
at this time but will be added by  
amendment when ascertained.

Defendants.

**CIVIL ACTION NO. 2022CV00836**

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**COMPLAINT FOR DAMAGES**

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COMES NOW, Karen Parquette, plaintiff in the above-captioned case, by and through undersigned counsel of record and files this Complaint for Damages and respectfully shows this Honorable Court as follows:

**VENUE AND JURISDICTION**

1.

The defendant Family Dollar Stores of Georgia, LLC is a foreign for-profit limited liability company who's registered agent resides in Gwinnett County, Georgia. As such, Defendant Family Dollar Stores of Georgia, LLC is subject to the venue of Gwinnett County, Georgia pursuant to O.C.G.A. § 14-2-510(b)(1).

2.

The occurrence which gives rise to this Complaint for Damages occurred in Clayton

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County Georgia. As such, Defendant Family Dollar Stores of Georgia, LLC is subject to the venue of Clayton County, Georgia pursuant to O.C.G.A. § 14-2-510(b)(3).

3.

The defendant Family Dollar Stores of Georgia, LLC is subject to the jurisdiction of this Honorable Court. See: O.C.G.A. § 9-10-91(2); International Shoe Co. v. Washington, 326 U.S. 310 (1945).

4.

This venue is proper as to the defendant Family Dollar Stores of Georgia, LLC.

5.

The defendant(s), JOHN DOES NOS 1-10, are individuals whose identities are unknown to the plaintiff but known to the defendants Family Dollar Stores of Georgia, LLC was operating within their capacity as employees of the defendant Family Dollar Stores of Georgia, LLC when the occurrence giving rise to this Complaint for Damages occurred.

6.

Defendant(s) JOHN DOES NOS 1-10 are alleged to be, at all times relevant to this Complaint for Damages, joint-tortfeasors with defendant Family Dollar Stores of Georgia, LLC.

7.

Defendant(s) JOHN DOES NOS 1-10 are subject to the jurisdiction of this Court. See: O.C.G.A. § 9-10-31(a).

8.

This venue is proper as to defendant(s) JOHN DOES NOS 1-10.

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**GENERAL FACTS COMMON TO ALL COUNTS**

9.

Plaintiff hereby incorporates all previous paragraphs of this Complaint for Damages.

**THE PREMISES**

10.

Defendant Family Dollar Stores of Georgia, LLC owns and/or operates a department store located at 4018 Jonesboro Rd, Forest Park, Georgia 30297 (hereinafter, "Family Dollar").

11.

Defendant(s) JOHN DOES NOS 1-10 are agents and/or employees of defendant Family Dollar.

12.

The aforementioned premises is open to the public for business.

13.

On or about June 21, 2020 Family Dollar, by express or implied invitation, induced or lead the Plaintiff to come upon the aforementioned premises for a lawful purpose.

14.

On or about June 21, 2020 Plaintiff was an invitee on the premises owned and operated by the defendant Family Dollar.

**CONDITIONS LEADING TO INJURY**

15.

While on the premises as an invitee, Plaintiff slipped on playing cards and fell down.

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16.

At all times relevant to this Complaint for Damages, there were no signs and/or warnings to put plaintiff on notice of a potentially dangerous hazard.

**INJURIES AND DAMAGES**

17.

The aforementioned circumstances pled in this Complaint for Damages resulted in serious injuries to plaintiff's body.

18.

As a foreseeable and proximate result of Plaintiff's injuries, the Plaintiff has incurred medical expenses in excess of \$29,342.86 and lost wages in excess of \$1.00.

19.

In addition to the aforementioned damages, Plaintiff has and will endure pain and suffering.

**COUNT I: PREMISES LIABILITY AS TO FAMILY DOLLAR**

20.

Plaintiff hereby incorporates all previous paragraphs of this Complaint for Damages.

21.

Defendant Family Dollar has and had a duty to exercise ordinary care in keeping the aforementioned store and its approaches safe.

22.

Defendant Family Dollar, breached the aforementioned duty on June 21, 2020 by failing to use ordinary care in preventing hazardous conditions which could result in an injury.

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23.

As a foreseeable and proximate result of the defendant Family Dollar's breach, the Plaintiff suffered serious injuries to Plaintiff's body as pled in this Complaint for Damages.

24.

As a foreseeable and proximate result of Plaintiff's injuries, the Plaintiff incurred damages as pled in this Complaint for Damages.

25.

Plaintiff has a cause of action against defendant Family Dollar for personal injuries arising from defendant's premises liability.

26.

Plaintiff is entitled to recover from the defendant Family Dollar for damages as pled in this Complaint for Damages.

**COUNT II: NEGLIGENCE AS TO JOHN DOES NOS 1-10**

27.

Plaintiff hereby incorporates all previous paragraphs of this Complaint for Damages.

28.

Defendant(s) JOHN DOES NOS 1-10, as a responsibility of employment, had and have a duty to inspect the aforementioned premises.

29.

Defendant(s) JOHN DOES NOS 1-10 breached this duty on June 21, 2020 by failing to keep approaches and walkways safe.

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30.

In the alternative or in addition thereto, defendant(s) JOHN DOES NOS 1-10 breached this duty on June 21, 2020 by failing to provide sufficient warnings of a risk of injury.

31.

As a foreseeable and proximate result of the defendant(s) JOHN DOES NOS 1-10's breach, the Plaintiff suffered serious injuries as pled in this Complaint for Damages.

32.

As a foreseeable and proximate result of Plaintiff's injuries, the Plaintiff has incurred damages as pled in this Complaint for Damages.

33.

Plaintiff has a cause of action against defendant(s) JOHN DOES NOS 1-10 for personal injuries arising from defendant's negligence.

34.

Plaintiff is entitled to recover from the defendant(s) JOHN DOES NOS 1-10 for damages as pled in this Complaint for Damages.

**COUNT III: VICARIOUS LIABILITY OF FAMILY DOLLAR**

35.

Plaintiff hereby incorporates all previous paragraphs of this Complaint for Damages.

36.

Defendant(s) JOHN DOES NOS 1-10 were acting within the scope of their employment when they committed the torts enumerated in Count II of this Complaint for Damages.

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37.

Defendant Family Dollar is liable for the negligent conduct of its employee under a theory of respondeat superior.

38.

In the alternative, defendant Family Dollar is liable to the plaintiff for negligent hiring and retention of an unsafe employee or any other applicable theory of vicarious liability.

39.

Plaintiff is entitled to recover from Family Dollar for damages which resulted from the negligent conduct pled in Count II of this Complaint for Damages.

WHEREFORE, the Plaintiff prays that:

- a. Summons be issued as to the Defendant(s);
- b. that the Defendant(s) be called to answer this Complaint for Damages;
- c. that a trial be held on all issues so triable;
- d. that a Judgment be entered against the Defendant for all the Plaintiff's specific damages including past and future medical expenses and past and future lost wages, if applicable;
- e. that said Judgment include an award of attorneys' fees and costs for the Defendant(s)' bad faith, stubborn litigiousness, and causing the Plaintiff unnecessary time and expense pursuant to O.C.G.A. § 13-6-11; see: Bo Phillips Co. v. R.L. King Properties, LLC, 336 Ga. App. 705 (2016);
- f. that said Judgment include a sum to compensate the Plaintiff for general damages in an amount to be determined by the enlightened conscience of a fair and impartial jury; and,
- g. such further relief as this Court determines is adequate and just.



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This 20 day of April 2022.

/s/ David T. Dorer

David T. Dorer

Attorney for the Plaintiff

State Bar No. 934408

DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com

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*Tiki Brown*  
Tiki Brown  
Clerk of State Court  
Clayton County, Georgia  
Hannah Lowery

IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA

KAREN PARQUETTE,

Plaintiff,

VS.

FAMILY DOLLAR STORES OF  
GEORGIA, LLC, and JOHN DOES  
NOS 1-10 whether singular or plural,  
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at this time but will be added by  
amendment when ascertained.

CIVIL ACTION NO. 2022CV00836

Defendants.

VERIFICATION OF COMPLAINT FOR DAMAGES

COMES NOW, the Plaintiff in the above-captioned case, and personally appears before  
the undersigned, being of sound mind, the legal age of majority, and operating under no  
deficiencies of intoxicants or medication, and verifies, under oath and penalty of perjury, that the  
attached Complaint for Damages is true and correct to the best of my personal knowledge.

This 25 day of April, 2022

*Karen Parquette*

Karen Parquette

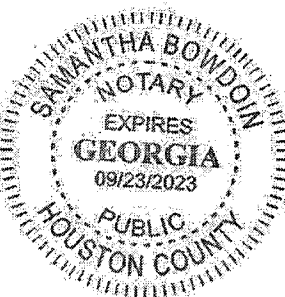
Sworn to and subscribed before me

this 25 day of April, 2022

*Samantha Bowdon*

Notary Public

My Commission Expires: 9/23/2023



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*Tiki Brown*  
Tiki Brown  
Clerk of State Court  
Clayton County, Georgia  
Hannah Lowery

IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA

KAREN PARQUETTE,

Plaintiff,

VS.

FAMILY DOLLAR STORES OF  
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amendment when ascertained.

Defendants.

CIVIL ACTION NO. 2022CV00836


---

**MOTION TO APPOINT A SPECIAL AGENT FOR SERVICE OF PROCESS**

---

COMES NOW, Plaintiff in the above-styled action and files this Motion to Appoint a  
Special Agent for Service of Process and shows this Honorable Court as follows:

1.

Plaintiff filed the instant lawsuit on April 26, 2022.

2.

Defendant has a “duty to avoid unnecessary costs of serving the summons” by  
acknowledging and waiving service of process pursuant to O.C.G.A. § 9-11-4(d). Plaintiff is  
affording the Defendant an opportunity to comply with this duty. See: Notice of Lawsuit, filed  
contemporaneously hereto.

However, in the event that the Defendant is non-compliant, Plaintiff has a duty to serve  
the Defendant within five (5) days of the person making such service receiving a copy of the

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Complaint and Summons. See: O.C.G.A. § 9-11-4(c). As such, the Plaintiff wishes to be prepared, and moves to appoint Plaintiff's process server to be ready to effectuate any service that may become necessary in this case.

3.

Plaintiff's process server meets the qualifications of being a process server in the State of Georgia. Exh. A.

4.

Plaintiff prays that this Honorable Court appoint Raymond Cross for purposes of service of process in this case.

This 26 day of April, 2022

/s/ David T. Dorer

David T. Dorer  
Attorney for the Plaintiff  
State Bar No. 934408

DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com

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*Tiki Brown*  
Tiki Brown  
Clerk of State Court  
Clayton County, Georgia  
Hannah Lowery

**IN THE STATE COURT OF CLAYTON COUNTY, GEORGIA**

9151 TARA BOULEVARD, ROOM 1CL181, JONESBORO, GEORGIA 30236

TELEPHONE: (770) 477-3388 \* FACSIMILE: (770) 472-8159

Karen Parquette

Plaintiff

Vs.

2022CV00836

Case Number

Family Dollar Stores of Georgia, LLC

2 Sun Court, Ste 400

Peachtree Corners, GA 30092

Defendant

**SUMMONS**

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

David T. Dorer  
Dozier Law Firm  
PO Box 13  
Macon, GA 31202  
478-742-8441  
dorerlawteam@dozierlaw.com

answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

**TIKI BROWN**  
**CLERK OF COURT**  
State Court of Clayton County

By: \_\_\_\_\_  
Deputy Clerk

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*Tiki Brown*  
Tiki Brown  
Clerk of State Court  
Clayton County, Georgia  
Hannah Lowery

IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA

KAREN PARQUETTE,

Plaintiff,

VS.

FAMILY DOLLAR STORES OF  
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NOS 1-10 whether singular or plural,  
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at this time but will be added by  
amendment when ascertained.

Defendants.

CIVIL ACTION NO. 2022CV00836

---

NOTICE OF LAWSUIT

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TO: Family Dollar

I am notifying you in writing, pursuant to my requirements under O.C.G.A. § 9-11-4(d)(3)(A), that a lawsuit in the above-captioned court has been commenced against you. A copy of the complaint in the above-captioned case is attached to this notice, as is required by O.C.G.A. § 9-11-4(d)(3)(C). This notice has been sent via certified mail with return receipt requested so as to be the most reliable means of ensuring delivery, above and beyond the requirements of O.C.G.A. § 9-11-4(d)(3)(B).

This is not a formal summons or notification from the court, but rather my request pursuant to Code Section 9-11-4 of the Official Code of Georgia Annotated that you sign and return the enclosed Acknowledgment of Service, Waiver of Issuance of a Summons, Waiver of Defense of Insufficiency of Service of Process, and Waiver of any Further Service in order to save the cost of serving you with a judicial summons and an additional copy of the complaint.

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Your duty to avoid the unnecessary cost of service under O.C.G.A. § 9-11-4(d)(3) will be properly performed if I and the Court receive a signed copy of the waiver within 30 days after the date designated below as the date on which this notice is received. I enclose a stamped and addressed envelope for your use. An extra copy of the waiver is also attached for your records.

**YOU ARE ENTITLED TO CONSULT WITH YOUR ATTORNEY REGARDING THIS MATTER.**

If you comply with this request and file with the above-captioned Court and return a copy to me of the signed Acknowledgment of Service, Waiver of the Issuance of a Summons, Waiver of Defenses of Insufficiency of Service of Process, and Waiver of any Further Service, the Waiver will be filed with the court and no summons will be served on you. The action will then proceed as if you had been served on the date the waiver is filed, except that you will not be obligated to answer the complaint before sixty (60) days from the date you execute the enclosed Acknowledgment of Service, Waiver of the Issuance of a Summons, Waiver of Defenses of Insufficiency of Service of Process, and Waiver of any Further Service.

If you do not return the signed waiver within the time indicated, I will take appropriate steps to effect formal service in a manner authorized by the Georgia Rules of Civil Procedure and will then, to the extent authorized by those Rules, ask the court to require you to pay the full cost of service of summons, which is set forth on the Notice of Duty to Avoid Unnecessary Costs of Service of Summons enclosed herein.

Subsection (d) of Code Section 9-11-4 of the Official Code of Georgia Annotated requires certain parties to cooperate in saving unnecessary costs of service of the summons and the pleading. A defendant located in the United States who, after being notified of an action and asked by a plaintiff located in the United States to waive service of a summons, fails to do so will

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be required to bear the cost of such service unless good cause be shown for such defendant's failure to sign and return the waiver.

**DUTY TO AVOID UNNECESSARY EXPENSES IN LITIGATION**

It is not good cause for a failure to waive service that a party believes that the complaint is unfounded, or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property. A party who waives service of the summons retains all defenses and objections (except any relating to the summons or to the service of the summons), and may later object to the jurisdiction of the court or to the place where the action has been brought.

A defendant who waives service must, within the time specified on the waiver form, serve on the plaintiff's attorney (or unrepresented plaintiff) a response to the complaint and also must file a signed copy of the response with the court. If the answer is not served within this time, a default judgment may be taken against that defendant. By waiving service, a defendant is allowed more time to answer than if the summons had been actually served when the request for waiver of service was received.

This 20 day of April 2022.

/s/ David T. Dorer  
David T. Dorer  
Attorney for the Plaintiff  
State Bar No. 934408

DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com



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**CERTIFICATE OF SERVICE**

I certify that I have served on the following persons, by certified mail and/or other reliable means, a copy of this notice, two copies of a proposed form for acknowledging and waiving service of process, a prepaid, self-addressed envelope, a copy of the Complaint, Summons, 5.2(2) certificate of service of discovery, original discovery requests, and all other filed notices, motions, orders, or pleadings in the above-captioned case to the following:

Family Dollar Stores of Georgia, LLC  
C/o Corporation Service Company  
2 Sun Court, Ste 400  
Peachtree Corners, Georgia 30092

This 20 day of April 2022.

/s/ David T. Dorer  
David T. Dorer  
Attorney for the Plaintiff  
State Bar No. 934408

DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com

2022CV00836

# EXHIBIT A

2022CV00836

STATE COURT OF SPALDING COUNTY  
STATE OF GEORGIA  
AFFIDAVIT OF RAYMOND CROSS

1.

My name is Raymond Cross, I have reached the age of legal majority, am of sound mind, have not taken any mind altering substances which would impair my testimony or would interfere with my full and complete understanding of the oath I have sworn to when providing this affidavit of my testimony.

2.

I am a citizen of the United States and I am unrelatedly blood or marriage, to the parties to this action.

3.

I am a licensed investigator in good standing with the State of Georgia and an employee of Cross and Mullins Investigations since 2014.

4.

I have been a court appointed process server in numerous Georgia counties including Bibb, Houston, Jones, Peach, Crawford and the Ocmulgee Judicial Circuit. I am a year-to-year appointed process server in Bibb Superior Court.

This 25 day of March, 2022

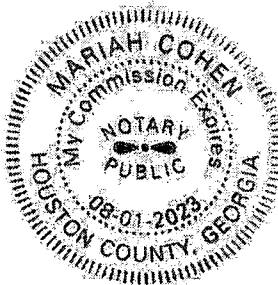
Raymond Cross  
Raymond Cross

Sworn to and subscribed before me

this 25 day of March, 2022

[Signature]  
Notary Public

My Commission Expires: 3-1-23



2022CV00836

IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA

KAREN PARQUETTE,

Plaintiff,

VS.

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NOS 1-10 whether singular or plural,  
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at this time but will be added by  
amendment when ascertained.

Defendants.

CIVIL ACTION NO. 2022CV00836

---

**ORDER APPOINTING SPECIAL AGENT FOR SERVICE OF PROCESS**

---

WHEREAS, the Plaintiff has moved this Court to appoint Raymond Cross as a special agent of service of process; and,

WHEREAS, the Defendant(s) has/have not yet been served in the above-captioned case; and,

WHEREAS, Raymond Cross meets the qualifications of a special agent of service of process under Georgia Law; it is so ORDERED.

Raymond Cross is hereby appointed as a special agent for service of process in the above-captioned case.

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• •

So ordered this \_\_\_\_ day of \_\_\_\_ 20\_\_.

\_\_\_\_\_  
Judge, State Court of Clayton County

Order Prepared By:

/s/ David Thomas Dorer

David Thomas Dorer

DOZIER LAW FIRM, LLC

Georgia Bar No. 934408

Attorney for the Plaintiff

2022CV00836

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*Tiki Brown*  
Tiki Brown  
Clerk of State Court  
Clayton County, Georgia  
Hannah Lowery

IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA

KAREN PARQUETTE,

Plaintiff,

VS.

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Defendants.

CIVIL ACTION NO. 2022CV00836

---

**RULE 5.2(2) CERTIFICATE OF SERVICE OF DISCOVERY**

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Pursuant to Uniform Rule 5.2(2), this is to certify that all parties to this action were served with copies of the Plaintiff's First Interrogatories, Request for Production, and Requests for Admission, and notice of deposition pursuant to O.C.G.A. § 9-11-30(b)(6) to **Family Dollar** in the above-captioned case.

Said service was/will be made contemporaneously with a copy of the Complaint and Summons in a manner consistent with the requirements of O.C.G.A. § 9-11-4. The date of service on the subsequently-filed affidavit of service of summons is the date that **Family Dollar** was served with the aforementioned discovery requests.

2022CV00836

• •

This 20 day of April 2022.

/s/ David T. Dorer

David T. Dorer

Attorney for the Plaintiff

State Bar No. 934408

DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com



## Notice of Service of Process

null / ALL  
Transmittal Number: 24869956  
Date Processed: 05/04/2022

**Primary Contact:** JJ Jacobson-Allen  
Dollar Tree Stores Inc  
500 Volvo Pkwy  
Chesapeake, VA 23320-1604

**Electronic copy provided to:** Heather Hunter

---

**Entity:** Family Dollar Stores of Georgia, LLC  
Entity ID Number 3697582

**Entity Served:** Family Dollar Stores of Georgia, LLC

**Title of Action:** Karen Parquette vs. Family Dollar Stores Of Georgia, LLC

**Matter Name/ID:** Karen Parquette vs. Family Dollar Stores Of Georgia, LLC (12256336)

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Clayton County State Court, GA

**Case/Reference No:** 2022CV00836

**Jurisdiction Served:** Georgia

**Date Served on CSC:** 05/04/2022

**Answer or Appearance Due:** 30 Days

**Originally Served On:** CSC

**How Served:** Certified Mail

**Sender Information:** Dozier Law Firm LLC  
478-742-8441

---

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)



Zack Dozier  
Jack Jenkins  
Sean Bewick  
Dustin W. Hamilton  
Ashley Cameron-Bivins  
Eric Alvarez (*Lic. in MI and GA*)  
Rich Jenkins  
Sean G. Hickey  
Col. George Phillips, M.D.



David Dozier  
Sam Hart, Jr.  
David T. Dorer  
James Kurhajian  
Travis Tuggle  
Lindsay Simmons  
Micah J. East  
Savanna Roughen

---

April 29, 2022

Via Certified Mail: 7020 1810 0000 2626 7493  
RETURN RECEIPT REQUESTED  
Family Dollar Stores of Georgia, LLC  
c/o Corporation Service Company  
2 Sun Ct, Ste 400  
Peachtree Corners, Georgia 30092

RE: Parquette v. Family Dollar et al, Clayton County State Court CAN: 2022CV00836  
Request for Acknowledgment and Waiver of Service of Process

Dear Family Dollar:

I represent Karen Parquette in the lawsuit that has been filed against you for your negligent conduct on or about 6/21/2020.

Enclosed is a request that you acknowledge and waive service of process. I am not your attorney. I cannot provide you with legal advice on acknowledging and waiving service; however, I can state that my client will seek the full penalties available in the event you refuse to do so within thirty (30) days of the receipt of this letter.

---

**487 CHERRY STREET, P.O. BOX 13, MACON, GA 31202-0013 |(478) 742-8441 | FAX (478) 745-9097**

401 MALL BOULEVARD, SUITE 103, SAVANNAH, GA 31406-4862 | (912) 239-4395 | FAX (912) 239-4401  
235 W. ROOSEVELT AVENUE, SUITE 100, ALBANY, GA 31701-2374 | (229) 299-9590 | FAX (229) 299-9610  
1388 SOUTHLAKE PLAZA DRIVE, MORROW, GA 30260-1756 | (404) 800-0308 | FAX (470) 533-0792

[www.dozierlaw.com](http://www.dozierlaw.com)

Sincerely,



---

David Thomas Dorer  
Dozier Law Firm, LLC  
Trial Lawyer

DTD/SLP

Enclosures: one (1) Case Initiation Form; one (1) Complaint for Damages; one (1) Summons; one (1) Notice of Lawsuit; two (2) proposed Acknowledgment and Waiver of Service of Process; one (1) Leave of Absence; one (1) 5.2(2) Certificate of Service of Discovery Requests and Corresponding Requests; one (1) self-addressed, stamped envelope.

**IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA**

**KAREN PARQUETTE,**

Plaintiff,

VS.

**FAMILY DOLLAR STORES OF  
GEORGIA, LLC, and JOHN DOES  
NOS 1-10** whether singular or plural,  
whether masculine or feminine, whether  
entities or individuals, whom are not known  
at this time but will be added by  
amendment when ascertained.

Defendants.

**CIVIL ACTION NO. 2022CV00836**

---

**ACKNOWLEDGMENT OF SERVICE, WAIVER OF ISSUANCE OF SUMMONS,  
WAIVER OF DEFENSES OF INSUFFICIENCY OF SERVICE OF PROCESS, AND  
WAIVER OF FURTHER SERVICE**

---

COMES NOW, Family Dollar, the Defendant(s) in the above-captioned action, and files this Acknowledgment of Service, Waiver of Issuance of Summons, Waiver of Defenses of Insufficiency of Service of Process, and Waiver of Further Service and Shows this Honorable Court as follows:

1.

Defendant(s) understand(s) that O.C.G.A. § 9-11-4(d)(2) requires certain parties to cooperate in saving unnecessary costs of service of the complaint in the above-captioned case.<sup>1</sup>

---

<sup>1</sup> A defendant located in the United States who, after being notified of an action and asked by a plaintiff located in the United States to waive service of summons, fails to do so will be required to bear the cost of such service unless good cause be shown for its failure to sign and return the waiver. It is not good cause for a failure to waive service that a party believes that the complaint is unfounded, or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property.

Defendant(s) acknowledge being located in the United States having been duly notified of an action and asked to waive service of summons, and therefore acknowledge that Defendant(s) would be responsible for the costs of service in the event of a failure to acknowledge and waive service of process.

2.

Defendant(s) hereby acknowledge(s) that the Plaintiff has provided Defendant(s) with an opportunity to return file this instrument within thirty (30) days of receipt. Therefore, the Plaintiff's request is proper under O.C.G.A. § 9-11-4(d)(3)(F).

3.

Defendant(s) in the above captioned case attest(s) to being in possession of a service copy of the Complaint in the above-captioned case. As such, Defendant(s) hereby acknowledge(s) service of the above-captioned Complaint. Defendant(s) also acknowledge(s) that the Plaintiff has agreed to permit Defendant(s) sixty (60) days to Answer the Complaint in the above-captioned case from the date of the execution of this waiver.

4.

In addition to acknowledging service, the undersigned Defendant(s) hereby waive the issuance of any summons in the above-captioned case.<sup>2</sup>

5.

Further, the undersigned Defendant(s) hereby waive the defense of insufficiency of

---

<sup>2</sup> Defendant(s) attest to having received a copy of the complaint in the above-captioned action, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to me. Defendant(s) understand the right to consult with an attorney regarding the consequences of signing this waiver. With this knowledge, Defendant(s) opt to execute this instrument.

service of process.<sup>3</sup>

6.

Further, the undersigned Defendant(s) hereby waive any further service in order to perfect service of process.<sup>4</sup>

7.

Defendant(s) understand that, by acknowledging service, waiving the issuance of a summons, waiving insufficiency of service of process, and waiving further service, Defendant(s) still must, within sixty (60) days file a response to the complaint and must also file a signed copy of the same response with the court. If the answer or motion is not served within this time, a default judgment may be taken against that defendant. By waiving service, a defendant is allowed more time to answer than if the summons had been actually served when the request for waiver of service was received.

8.

Defendant(s) agree(s) to file this instrument with the Court.

WHEREFORE, the undersigned hereby Acknowledges Service, Waives the Issuance of a Summons, Waives Defenses of Insufficiency of Service of Process, and Waives any Future

---

<sup>3</sup> Defendant(s) recognize that any failure to waive service of process can leave Defendant(s) liable for attorney's fees and costs associated with perfecting service, and that the waiver of service of process does not waive the affirmative defenses of improper venue or lack of personal jurisdiction. Defendant(s) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.

<sup>4</sup> Defendant(s) agree(s) to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that Defendant(s) be served with judicial process in the manner provided by the Georgia Rules of Civil Procedure.

Service in order to Perfect Service.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Family Dollar Stores of Georgia,  
LLC

**CERTIFICATE OF SERVICE**

I hereby certify that I have served on all parties to this litigation a copy of the foregoing pleading by depositing the same in the U.S. Mail with proper postage affixed and addressed to:

David Thomas Dorer  
Dozier Law Firm, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202-0013  
dorerlawteam@dozierlaw.com

Respectfully submitted this \_\_\_\_ day of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
Family Dollar Stores of Georgia, LLC

Prepared By:  
David Thomas Dorer  
DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com

**IN THE STATE COURT OF CLAYTON COUNTY  
STATE OF GEORGIA**

**KAREN PARQUETTE,**

Plaintiff,

VS.

**FAMILY DOLLAR STORES OF  
GEORGIA, LLC, and JOHN DOES**

**NOS 1-10** whether singular or plural,  
whether masculine or feminine, whether  
entities or individuals, whom are not known  
at this time but will be added by  
amendment when ascertained.

Defendants.

**CIVIL ACTION NO. 2022CV00836**

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**ACKNOWLEDGMENT OF SERVICE, WAIVER OF ISSUANCE OF SUMMONS,  
WAIVER OF DEFENSES OF INSUFFICIENCY OF SERVICE OF PROCESS, AND  
WAIVER OF FURTHER SERVICE**

---

COMES NOW, Family Dollar, the Defendant(s) in the above-captioned action, and files this Acknowledgment of Service, Waiver of Issuance of Summons, Waiver of Defenses of Insufficiency of Service of Process, and Waiver of Further Service and Shows this Honorable Court as follows:

1.

Defendant(s) understand(s) that O.C.G.A. § 9-11-4(d)(2) requires certain parties to cooperate in saving unnecessary costs of service of the complaint in the above-captioned case.<sup>1</sup>

---

<sup>1</sup> A defendant located in the United States who, after being notified of an action and asked by a plaintiff located in the United States to waive service of summons, fails to do so will be required to bear the cost of such service unless good cause be shown for its failure to sign and return the waiver. It is not good cause for a failure to waive service that a party believes that the complaint is unfounded, or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property.

Defendant(s) acknowledge being located in the United States having been duly notified of an action and asked to waive service of summons, and therefore acknowledge that Defendant(s) would be responsible for the costs of service in the event of a failure to acknowledge and waive service of process.

2.

Defendant(s) hereby acknowledge(s) that the Plaintiff has provided Defendant(s) with an opportunity to return file this instrument within thirty (30) days of receipt. Therefore, the Plaintiff's request is proper under O.C.G.A. § 9-11-4(d)(3)(F).

3.

Defendant(s) in the above captioned case attest(s) to being in possession of a service copy of the Complaint in the above-captioned case. As such, Defendant(s) hereby acknowledge(s) service of the above-captioned Complaint. Defendant(s) also acknowledge(s) that the Plaintiff has agreed to permit Defendant(s) sixty (60) days to Answer the Complaint in the above-captioned case from the date of the execution of this waiver.

4.

In addition to acknowledging service, the undersigned Defendant(s) hereby waive the issuance of any summons in the above-captioned case.<sup>2</sup>

5.

Further, the undersigned Defendant(s) hereby waive the defense of insufficiency of

---

<sup>2</sup> Defendant(s) attest to having received a copy of the complaint in the above-captioned action, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to me. Defendant(s) understand the right to consult with an attorney regarding the consequences of signing this waiver. With this knowledge, Defendant(s) opt to execute this instrument.



service of process.<sup>3</sup>

6.

Further, the undersigned Defendant(s) hereby waive any further service in order to perfect service of process.<sup>4</sup>

7.

Defendant(s) understand that, by acknowledging service, waiving the issuance of a summons, waiving insufficiency of service of process, and waiving further service, Defendant(s) still must, within sixty (60) days file a response to the complaint and must also file a signed copy of the same response with the court. If the answer or motion is not served within this time, a default judgment may be taken against that defendant. By waiving service, a defendant is allowed more time to answer than if the summons had been actually served when the request for waiver of service was received.

8.

Defendant(s) agree(s) to file this instrument with the Court.

WHEREFORE, the undersigned hereby Acknowledges Service, Waives the Issuance of a Summons, Waives Defenses of Insufficiency of Service of Process, and Waives any Future

---

<sup>3</sup> Defendant(s) recognize that any failure to waive service of process can leave Defendant(s) liable for attorney's fees and costs associated with perfecting service, and that the waiver of service of process does not waive the affirmative defenses of improper venue or lack of personal jurisdiction. Defendant(s) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.

<sup>4</sup> Defendant(s) agree(s) to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that Defendant(s) be served with judicial process in the manner provided by the Georgia Rules of Civil Procedure.

Service in order to Perfect Service.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Family Dollar Stores of Georgia,  
LLC

**CERTIFICATE OF SERVICE**

I hereby certify that I have served on all parties to this litigation a copy of the foregoing pleading by depositing the same in the U.S. Mail with proper postage affixed and addressed to:

David Thomas Dorer  
Dozier Law Firm, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202-0013  
dorerlawteam@dozierlaw.com

Respectfully submitted this \_\_\_\_ day of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
Family Dollar Stores of Georgia, LLC

Prepared By:  
David Thomas Dorer  
DOZIER LAW FIRM, LLC  
487 Cherry Street  
P.O. Box 13  
Macon, Georgia 31202  
(478) 742-8441  
dorerlawteam@dozierlaw.com

2022CV00836

e-Filed 4/26/2022 12:37 PM

## General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of Clayton County

*Tiki Brown*  
 Tiki Brown  
 Clerk of State Court  
 Clayton County, Georgia  
 Hannah Lowery

## For Clerk Use Only

Date Filed 4/26/2022

MM-DD-YYYY

Case Number 2022CV00836

## Plaintiff(s)

Parquette Karen

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney \_\_\_\_\_

## Defendant(s)

Family Dollar Stores of Georgia, LLC

Last First Middle I. Suffix Prefix

Does Nos 1-10, John

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number \_\_\_\_\_ Self-Represented ☐

## Check One Case Type in One Box

## General Civil Cases

- ☐ Automobile Tort  
☐ Civil Appeal  
☐ Contract  
☐ Garnishment  
☒ General Tort  
☐ Habeas Corpus  
☐ Injunction/Mandamus/Other Writ  
☐ Landlord/Tenant  
☐ Medical Malpractice Tort  
☐ Product Liability Tort  
☐ Real Property  
☐ Restraining Petition  
☐ Other General Civil

## Domestic Relations Cases

- ☐ Adoption  
☐ Dissolution/Divorce/Separate Maintenance  
☐ Family Violence Petition  
☐ Paternity/Legitimation  
☐ Support – IV-D  
☐ Support – Private (non-IV-D)  
☐ Other Domestic Relations

## Post-Judgment – Check One Case Type

- ☐ Contempt  
☐ Non-payment of child support, medical support, or alimony  
☐ Modification  
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number \_\_\_\_\_

Case Number \_\_\_\_\_

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. \_\_\_\_\_  
 Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.  
 No \_\_\_\_\_